

Amendment and Response  
NOR-089 (BA0367.1)  
U.S.S.N. 09/632.294  
Page 10 of 13

### **REMARKS**

Claims 1-24 and 26-30 were presented for examination. The Office Action rejects claims 1-24, objects to claims 3 and 16 for being dependent upon a rejected base claim, and allows claims 26-30. Applicants thank the Examiner for the allowance of these claims. This paper requests reconsideration of the rejection. Claims 1-24 and 26-30 remain pending in the application.

#### **Rejection of claim 10 under 35 U.S.C. § 112**

The Office Action rejects claim 10 under 35 U.S.C. § 112 for lack of antecedent basis for the limitation "the relationship." Applicants have amended claim 10 to remedy the problem of antecedent basis and respectfully submit that the amendment overcomes the rejection.

#### **Rejection of claims 1-24 under 35 U.S.C. § 103(a)**

The Office Action rejects claims 1-24 under 35 U.S.C. 103(a) as being unpatentable over Henderson (U.S. Patent No. 6,058,103) in view Agesen (U.S. Patent No. 6,253,215). Applicants respectfully traverse this rejection because the cited references, whether taken alone or in combination, do not teach or suggest the Applicants' invention.

Applicants' invention provides an interface to network management information. More specifically, as set forth in Applicants' representative claim 1, Applicants' invention produces an object-oriented interface to a *non-object oriented* MIB. This interface includes object-oriented classes and methods, which correspond to the non-object oriented MIB, and which can be used by an object-oriented application to access information in the *non-object oriented* MIB.

Henderson teaches a system for managing a telecommunications network. The management system extracts data from the physical

Amendment and Response  
NOR-089 (BA0367.1)  
U.S.S.N. 09/632,294  
Page 11 of 13

telecommunications network to build an object model representation of the network. This object model representation is stored in a management information base (MIB), accessible through a CMIP-compliant interface or a TMN object-oriented interface (col. 11, lines 40-44). The use of a CMIP-compliant interface, which is an object-oriented protocol, or a TMN object-oriented interface implies that Henderson's MIB is object-oriented. Unlike the Applicants' claimed invention, therefore, Henderson does not disclose or suggest the use of a *non-object oriented MIB*. Therefore, contrary to the Office Action's assertion, Henderson does not teach receiving a non-object oriented MIB at a compiler of a network device, as set forth in the Applicants' claimed invention.

In addition, Henderson does not teach the Applicants' step of extracting a subset of information from the non-object oriented MIB. In fact, a careful read of the passage referred to by the Office Action (i.e., col. 4, lines 19-34) does not teach extracting data from the MIB, but rather extracting data *from the physical telecommunications network* to build an object model that is stored in the MIB. Consequently, Henderson does not teach either of the Applicants' claimed steps thought by the Office Action to be taught by Henderson. When this recognition is taken in combination with the Office Action's admission that Henderson does not teach the Applicants' steps of "producing an object-oriented interface, for use by an object-oriented application to access the subset of information in the non-object oriented MIB, generating a set of object-oriented classes and object-oriented methods corresponding to the subset of information in the non-object oriented MIB," Henderson is found not to teach *any* of the Applicants' claimed steps.

The other cited reference, Agesen, discloses a resource management system (i.e., garbage collection) for applications having two types of program

Amendment and Response  
NOR-089 (BA0367.1)  
U.S.S.N. 09/632,294  
Page 12 of 13

code, namely native and non-native code (i.e., target code). According to Agesen, the use of native and target code in the same application tends to complicate the management of memory resources. Agesen also discloses that for Java virtual machines, the target code is generally written in the Java programming language. The Java programming language includes an application program interface (API) that developers can use to write object-oriented programs.

Like Henderson, however, Agesen does not teach the use of non-object oriented MIBs. On the subject of MIBs, of any kind, Agesen is completely silent – Agesen is unrelated to network management. And although Agesen does disclose the general use of Java APIs, the mere existence of an object-oriented API does not teach or suggest producing an object-oriented interface for accessing information in a non-object oriented MIB, as set forth in the Applicants' claimed invention. And although Agesen does disclose applications with both target code (e.g., object-oriented code) and native code (e.g., C or non-object oriented code), the mere coexistence of two types of code on a system does not teach or suggest using an object-oriented interface to access information in a non-object oriented MIB. Therefore, any combination of Agesen and Henderson fails to teach or suggest every limitation of the Applicants' invention. Applicants respectfully request that the rejection be withdrawn.

Independent claims 8, 14, 21, 22, 23, and 24 recite language similar to the language recited in claim 1, namely the use of an object-oriented interface (having object-oriented classes and methods) to access information in a non-object oriented MIB. Therefore, these independent claims are also patentably distinguishable over the cited references for at least those reasons provided in connection with claim 1. In addition, dependent claims 2-7, 9-13, and 15-20

Amendment and Response  
NOR-089 (BA0367.1)  
U.S.S.N. 09/632,294  
Page 13 of 13

depend directly or indirectly from patentable independent claims 1, 8, or 14, and incorporate all of its respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Moreover, each dependent claim recites an additional limitation, which, in combination with the elements and limitations of its respective independent claim, further distinguishes that dependent claim from the cited references. Therefore, the Applicants respectfully request withdrawal of the rejection against these claims.

### **CONCLUSION**

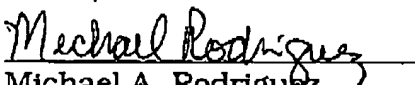
In view of the amendments and arguments made herein, Applicants submit that the application is in condition for allowance and requests early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicants' representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003 ext. 12.

Respectfully submitted,

Date: 5/22/06  
Reg. No. 41,274

Tel. No.: (508) 303-2003 ext. 12  
Fax No.: (508) 303-0005

  
Michael A. Rodriguez  
Attorney for Applicants  
Guerin & Rodriguez, LLP  
5 Mount Royal Avenue  
Marlborough, MA 01752